



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

April 2, 2002

CERTIFIED MAIL # 7000 1530 0005 5348 5127

Mr. Ben Strawn
Director of Building Services
St. Luke's Regional Medical Center
190 East Bannock
Boise, Idaho 83712

RE: T2-010035, St. Luke's Regional Medical Center
Final Tier II Operating Permit No. 001-00029

Dear Mr. Strawn:

The Idaho Department of Environmental Quality (Department) is issuing Tier II Operating Permit Number 001-00029 for St. Luke's Regional Medical Center in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II Operating Permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. This Tier II permit is effective immediately and supersedes your previous permit issued on August 15, 1996. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Please note the changes made following the public comment period for Permit Conditions 3.12 and 3.18. These changes were made to be consistent with the Federal New Source Performance Standards (NSPS) applicable to Boilers 3 and 4.

Mr. Matt Stoll of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department strongly recommends attendance of your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision.

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However, the Department encourages you to contact us to discuss any concerns you may have with the enclosed permit prior to filing a petition for a contested case.



Katherine B. Kelly
Administrator
Air Quality Division

KK/KB/sm
Enclosure

cc: Matt Stoll, Boise Regional Office
Sherry Davis, Technical Services
Laurie Kral, EPA Region 10

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**Air Quality
TIER II OPERATING PERMIT**
State of Idaho
Department of Environmental Quality

PERMIT NO.: 001-00029

AQCR: 64

CLASS: SM

SIC: 8062

ZONE: 11

UTM COORDINATE (km): 565.2 , 4829.2

1. PERMITTEE

St. Luke's Regional Medical Center

2. PROJECT

Tier II Permit Renewal and Fuel Oil Usage Increase

3. MAILING ADDRESS

190 E. Bannock St.

CITY

Boise

STATE

ID

ZIP

83712

4. FACILITY CONTACT

Ben Strawn

TITLE

Director of Building Services

TELEPHONE

208-381-2255

5. RESPONSIBLE OFFICIAL

Ben Strawn

TITLE

Director of Building Services

TELEPHONE

208-381-2255

6. EXACT PLANT LOCATION

190 E. Bannock Street, Boise, Idaho

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

General Medical and Surgical Hospital

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho, (Rules) IDAPA 58.01.01.400*, and pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules*.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: April 2, 2002

DATE EXPIRES: April 2, 2007

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LIST OF ACRONYMS

acfm	Actual Cubic Feet Per Minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
Btus	British Thermal Units
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DEQ	Idaho Department of Environmental Quality
dscf	Dry Standard Cubic Feet
EF	Emission Factor
EFB	Electrified Filter Bed
EPA	Environmental Protection Agency
gpm	Gallons Per Minute
gr	Grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IDAPA	Idaho Administrative Procedures Act
km	Kilometer
lb/hr	Pound Per Hour
MACT	Maximum Available Control Technology
MMBtu	Million British Thermal Units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
O ₃	Ozone
O&M	Operations and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter with an Aerodynamic Diameter of 10 Micrometers or Less
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
PTC	Permit To Construct
PTE	Potential To Emit
SCC	Source Classification Code
scf	Standard Cubic Feet
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TSP	Total Suspended Particulates
T/yr	Tons Per Year
μm	Micrometers
VOC	Volatile Organic Compound

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00029

Permittee: St. Luke's Regional Medical Center
Location: Boise, Idaho

Date Issued: April 2, 2002
Date Expires: April 2, 2007

1. TIER II OPERATING PERMIT SCOPE**Purpose**

- 1.1 Tier II operating permit (OP) renewal and fuel oil usage increase.
- 1.2 This Tier II permit supercedes the following permits:
Tier II OP #001-00029, issued August 15, 1996
Permit to Construct #001-00029, issued July 28, 1993 and re-issued June 20, 1994

Regulated Sources

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this Tier II operating permit:

Table 1.1 Regulated Emission Sources

Permit Section	Source Description	Emissions Control(s)
3	Boiler No. 1 – Cleaver Brooks Natural Gas-Fired, No. 2 fuel oil back up 29.29 MMBtu/hr rated heat input capacity Model:CB200-700, Serial Number: L-61585	None
3	Boiler No. 2 – Cleaver Brooks Natural Gas-Fired, No. 2 fuel oil back up 29.29 MMBtu/hr rated heat input capacity Model:CB200-700, Serial Number: L-61406	None
3	Boiler No. 3 – Cleaver Brooks Natural Gas-Fired, No. 2 fuel oil back up 29.29 MMBtu/hr rated heat input capacity Model:CB200-700, Serial Number: L-89707	None
3	Boiler No. 4 – Cleaver Brooks Natural Gas-Fired, No. 2 fuel oil back up 29.29 MMBtu/hr rated heat input capacity Model:CB200-700, Serial Number: L-89707	None
4	Emergency Generator No. 1 – Caterpillar Diesel-fired, 900 kW rated output capacity Model: D399, Serial Number: 35B1379	None
4	Emergency Generator No. 2 – Caterpillar Diesel-fired, 1050 kW rated output capacity Model: 3512, Serial Number: 24Z1313	None
4	Emergency Generator No. 3 – Caterpillar Diesel-fired, 2000 kW rated output capacity Model: 3516, Serial Number: 4XF00419	None
4	Emergency Generator No. 4 – Caterpillar Diesel-fired, 350 kW rated output capacity Model: 3406B, Serial Number: 4RG01205	None
4	Emergency Generator No. 5 – Caterpillar Diesel-fired, 65 kW rated output capacity Model: 3304, Serial Number: 83Z02429	None
4	Emergency Generator No. 6 – Caterpillar Diesel-fired, 105 kW rated output capacity Model: 3304, Serial Number: 4B10118	None

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Unregulated Sources

1.4 Table 1.2 below lists sources of emissions that do not warrant regulation in this permit.

Table 1.2 Emission Sources

Source Description	Emission Controls
#4 Sterilizer, AMSCO Model Eagle 3000 ETO #5 Sterilizer, AMSCO Model Eagle 2000 ETO #6 Sterilizer, AMSCO Model Eagle 3000 ETO Aerators B, C, and D, AMSCO	Disposers #1 and #2, AMSCO Model 100 CFM Abator
Underground #2 fuel oil storage tanks Tank 1 – 1,000 gal Tank 2 – 2,000 gal Tank 3 – 12,000 gal Tank 4 – 4,000 gal Tank 5 – 25,000 gal	None

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2. FACILITY-WIDE CONDITIONS

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

Visible Emissions

- 2.2 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which has greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

- 2.3 Unless specified elsewhere in this permit, the permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from an point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall, at a minimum, include the date and results of each inspection and test, and a description of the following: The permittee's assessment of the conditions existing at the time visible emissions are present (if observed); any corrective action taken in response to the visible emissions; and the date corrective action was taken.

[IDAPA 58.01.01.405.01, 5/1/94]

Excess Emissions

- 2.4 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Reports and Certifications

- 2.5 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, Idaho 83706-2239

[IDAPA 58.01.01.405.01, .11, 5/1/94]

Fuel-burning Equipment

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Location: Boise, Idaho

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- 2.6 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas or 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel.

[IDAPA 58.01.01.676-677, 5/1/94]

Sulfur Content

- 2.7 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

2.7.1 ASTM Grade 1 fuel oil - 0.3% by weight.

2.7.2 ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

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3. BOILERS NO. 1, 2, 3, AND 4

3.1 Process Description

The primary purpose of Boilers 1, 2, 3, and 4 is to generate steam for space heating.

3.2 Control Description

Emissions from the boilers are uncontrolled.

Emissions Limits

3.3 Emissions Limits

Emissions of particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM₁₀), nitrogen oxides (NO_x), and sulfur oxides (SO₂) from the boilers shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

[IDAPA 58.01.01.403, 5/1/94]

Operating Requirements

3.4 Fuel for Boilers No. 1, 2, 3, and 4

The primary fuel for Boilers No. 1, 2, 3, and 4 shall be natural gas. Secondary fuel shall be No. 2 fuel oil.

[IDAPA 58.01.01.405.01, 5/1/94]

3.5 Maximum Natural Gas Consumption

The total maximum natural gas consumption of Boilers Nos. 1, 2, 3, and 4 shall not exceed 133 million standard cubic feet per year in any 12-month period.

[IDAPA 58.01.01.405.01, 5/1/94]

3.6 Operations on No. 2 Fuel Oil

Total maximum operation of Boilers No. 1, 2, 3, and 4 on No. 2 diesel fuel oil shall not exceed a total of 1,298 hours in any 12-month period.

[IDAPA 58.01.01.405.01, 5/1/94]

3.7 Operation on No. 2 Fuel Oil During Atmospheric Stagnation Advisory Periods

Operation of Boilers No. 1, 2, 3, and 4 on No. 2 fuel oil for testing purposes shall not be conducted, except for emergencies, during any period in which an Atmospheric Stagnation Advisory and/or a mandatory Wood Stove Curtailment have been declared in Boise by the Department.

[IDAPA 58.01.01.405.01, 5/1/94]

3.8 Boiler Operation

Only one of the four boilers may be operated at a time while burning No. 2 fuel oil.

[IDAPA 58.01.01.405.01, 5/1/94]

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3.9 Operating Hours

The number of operation hours of burning No. 2 fuel oil shall not exceed the daily amount determined using the following equation:

$$\text{hours / day} = 5.08 / S$$

Where S indicates that the weight % of sulfur in the oil (e.g., if the fuel is 0.5% sulfur, then S = 0.5)

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping Requirements

3.10 Operation on No. 2 Fuel Oil

The permittee shall monitor and record the date, and the number of hours that each boiler operates on No. 2 diesel fuel.

[IDAPA 58.01.01.405.01, 5/1/94]

3.11 Natural Gas Fuel Consumption

The permittee shall monitor and record on a monthly basis the total natural gas consumption of the facility.

[IDAPA 58.01.01.405.01, 5/1/94]

3.12 Fuel Combusted in Boilers 3 and 4

The permittee shall record and maintain records for the most recent 5 year period the amounts of fuel combusted in each boiler during each day.

[40 CFR 60.48c(g)]

3.13 Maintenance of Records

A compilation of the most recent five years of data required in Permit Conditions 3.10, 3.11, and 3.12 shall be kept onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

3.14 Fuel Certification

The permittee shall test or obtain a fuel certification for the sulfur content of the No. 2 fuel oil from the fuel supplier for each supply of fuel oil received. The permittee shall record the date each supply was received and the corresponding sulfur content. If No. 2 fuel oils are mixed from different suppliers, the highest value of fuel oil sulfur content provided by these suppliers shall be used to determine the daily allowable operating hours of the boiler.

[IDAPA 58.01.01.405.01, 5/1/94]

3.15 Calculation of Daily Operating Hours

The permittee shall calculate and record the allowable number of daily operation hours for burning No. 2 fuel oil in accordance with the equation in Permit Condition 3.9 using information obtained in Permit Condition 3.14.

[IDAPA 58.01.01.405.01, 5/1/94]

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3.16 Record Operating Hours

If any boiler is fired by No. 2 fuel oil for any period on any day, the permittee shall record for each boiler, for that day, the date, the number of operation hours burning No. 2 fuel oil, and the corresponding allowable number of daily operating hours from Permit Condition 3.9. Each month the permittee shall record the accumulated number of operation hours for the previous 12 month period for all boilers combined that have been burning No. 2 fuel oil. These records shall be kept in a log on-site for a period of at least 5 years.

[IDAPA 58.01.01.405.01, 5/1/94]

3.17 Operations and Maintenance Manual Requirements

The permittee shall at all times maintain in good working order and operate, as efficiently as practicable, the oil and gas-fired boilers. An Operation and Maintenance (O&M) Manual shall be developed and followed by the permittee and submitted to the Department for approval within 60 days of issuance of this permit. The O&M Manual shall be updated as necessary and at a minimum shall include the most recent general descriptions of the equipment; the normal operating conditions and procedures for the boiler; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures.

[IDAPA 58.01.01.405.01, 5/1/99]

Reporting Requirements

3.18 NSPS Report for Boilers 3 and 4

The permittee shall submit to the Department an annual calendar year report no later than 30 days after the end of the calendar year. The report shall include records of fuel supplier certification containing 1) the name of the oil supplier and 2) a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c. The report shall include a statement signed by the permittee that the records of fuel supplier certifications submitted represent all the fuel oil combusted during the period.

[40 CFR 60.48c(f)]

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4. EMERGENCY GENERATORS NO. 1, 2, 3, 4, 5, AND 6

4.1 Process Description

The primary purpose of these generators is to generate electricity for the hospital in the event of a power interruption.

4.2 Control Description

Emissions from the diesel engines are uncontrolled.

Operating Requirements

4.3 Operating Schedule

The operation of each emergency diesel generator shall not exceed a maximum of 60 hours in any consecutive 12 month period. This limit shall not apply during times of electric power outages to the hospital.

[IDAPA 58.01.01.405.01, 5/1/99]

4.4 Operation During Atmospheric Stagnation Advisory Periods

All emergency generators shall not be operated, except for emergencies, during any period in which the Department has declared an Atmospheric Stagnation Advisory and/or a mandatory Wood Stove Curtailment in Boise.

[IDAPA 58.01.01.405.01, 5/1/99]

4.5 Fuel Specification

All six emergency diesel generators shall use No. 2 diesel fuel exclusively.

[IDAPA 58.01.01.405.01, 5/1/99]

Monitoring and Recordkeeping Requirements

4.6 Emergency Generator Operations

The permittee shall monitor and record the date, number of hours of operation, and reason for the operation of each emergency generating set. A compilation of the most recent five years of data shall be kept onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/99]

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5. APPENDIX – EMISSION LIMITS**SAINT LUKE'S REGIONAL MEDICAL CENTER – BOISE****Table 5.1 Boilers Operating On Natural Gas**

Source	PM		PM ₁₀		NO _x	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler No.1	0.40		0.40		4.10	
Boiler No. 2	0.40		0.40		4.10	
Boiler No. 3	0.40		0.40		4.10	
Boiler No. 4	0.40		0.40		4.10	
Aggregated Boilers						9.29

Table 5.2 Boilers Operating on no. 2 Fuel Oil

Source	PM		PM ₁₀		NO _x		SO ₂	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler No.1	0.43		0.43		0.28		15.2	
Boiler No. 2	0.43		0.43		0.28		15.2	
Boiler No. 3	0.43		0.43		0.28		15.2	
Boiler No. 4	0.43		0.43		0.28		15.2	
Accumulate		0.28		0.28		2.8		9.9

Notes: Compliance determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

PM and PM₁₀ limits include condensables.

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6. TIER II PERMIT GENERAL PROVISIONS

- 6.1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
- 6.2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 6.3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - 6.3.1 To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 6.3.2 At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
- 6.4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 6.5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 6.6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- 6.7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be void.
- 6.8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 6.9. Performance tests (i.e., air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests).

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The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- 6.10 The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.